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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 3:24-CR-00243-WHA
)	
Plaintiff,)	PARTIES' REQUEST TO SET A CHANGE OF
)	PLEA HEARING AND STIPULATION TO
v.)	ADJUST THE PRETRIAL SCHEDULE AND
)	[PROPOSED] ORDER
DANIEL SCHATT, and)	
JOSEPH PODULKA,)	
)	
Defendants.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendants Daniel Schatt and Joseph Podulka, that the Court set a change of plea hearing for both defendants on May 13, 2025, at 9:00 am, and adjust the pretrial schedule to account for that upcoming change of plea hearing, as further described below.

The parties are in the process of finalizing plea agreements under Federal Rule of Criminal Procedure 11(c)(1)(C). The parties understand that the Court is unavailable for a change of plea hearing

STIPULATION AND [PROPOSED] ORDER
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until May 13, 2025 at 9:00 a.m., and therefore request that date and time for a change of plea hearing.

At this time, the parties are not requesting the Court vacate the trial date of July 7, 2025, but anticipate doing so at the conclusion of the May 13, 2025, change of plea hearing. However, based on the parties' request for a change of plea hearing and additional dates in June 2025 on which the parties understand the Court may no longer be available, the parties also jointly request adjustments to the existing pretrial schedule. Specifically, the parties request the Court make the following adjustments:

Current Date (Dkt. 74)	Requested New Date	Event
May 5, 2025	May 27, 2025	Deadline to exchange witness and exhibit lists and expert disclosures.
May 19, 2025 at noon	June 10, 2025 at noon	Deadline to file motions in <i>limine</i> and proposed jury questionnaire.
May 26, 2025 at noon	June 17, 2025 at noon	Deadline for oppositions to motions in <i>limine</i> , proposed <i>voir dire</i> , pretrial conference statements, jury instructions, and witness and exhibit lists.
June 11, 2025 at 2:00 pm	June 25, 2025 at 2:00 pm	Final pretrial conference.
July 7, 2025 at 8:00 am	July 7, 2025 at 8:00 am	Trial

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendants to file this stipulation and proposed order.

IT IS SO STIPULATED.

PATRICK D. ROBBINS
Acting United States Attorney

Dated: April 17, 2025

/s/
BARBARA J. VALLIERE
PATRICK K. O'BRIEN
RICHARD EWENSTEIN
Assistant United States Attorneys

Dated: April 17, 2025

/s/
DAVID H. ANGELI
MILES EHRLICH
Attorneys for Defendant Daniel Schatt

1 Dated: April 17, 2025

/s/
ED SWANSON
CARLY BITMAN
Attorneys for Defendant Joseph Podulka

[PROPOSED] ORDER

For the reasons described in the parties' stipulation, the Court sets a change of plea hearing for defendants Daniel Schatt and Joseph Podulka for May 13, 2025 at 9:00 am. The trial schedule in this case is amended as follows, pending further order of the Court:

Dates	Event
May 27, 2025	Deadline to exchange witness and exhibit lists and expert disclosures.
June 10, 2025 at noon	Deadline to file motions in <i>limine</i> and proposed jury questionnaire.
June 17, 2025 at noon	Deadline for oppositions to motions in <i>limine</i> , proposed <i>voir dire</i> , pretrial conference statements, jury instructions, and witness and exhibit lists.
June 25, 2025 at 2:00 pm	Final pretrial conference.
July 7, 2025 at 8:00 am	Trial

IT IS SO ORDERED.

19 DATED: _____

HONORABLE WILLIAM ALSUP
United States District Judge